

1 CONTOS & BUNCH
2 5855 Topanga Canyon Boulevard
3 Suite 400
4 Woodland Hills, California 91367-4694
5 Telephone (818) 716-9400

6 Attorneys for Defendant and
7 Cross-Complainant GERALD ARMSTRONG

8 SUPERIOR COURT OF THE STATE OF CALIFORNIA
9 FOR THE COUNTY OF LOS ANGELES

11	CHURCH OF SCIENTOLOGY OF)	CASE NO.: C 420 153
12	CALIFORNIA, a California)	
13	Corporation,)	[Severed Action]
14	Plaintiff,)	
15	vs.)	REQUEST FOR PRODUCTION OF
16	GERALD ARMSTRONG, et al.,)	DOCUMENTS FROM CROSS-COMPLAINANT
17	Defendants.)	GERALD ARMSTRONG TO CROSS-
18)	DEFENDANT CHURCH OF SCIENTOLOGY
19)	OF CALIFORNIA
20)	
21	AND RELATED CROSS-ACTIONS.)	
22)	

EXHIBIT 10 PAGE 26

20 TO CROSS-DEFENDANT CHURCH OF SCIENTOLOGY OF CALIFORNIA AND TO
21 ITS ATTORNEYS OF RECORD:

22 PLEASE TAKE NOTICE that pursuant to Code of Civil
23 Procedure, Section 2031, on September 9, 1986, at
24 10:00 a.m. at the Law Offices of Contos & Bunch, 5855 Topanga
25 Canyon Boulevard, Suite 400, Woodland Hills, California,
26 Cross-Complainant requests Cross-Defendant to produce for
27 copying and inspection by counsel for Cross-Complainant each
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1 of the documents specified in Schedule A annexed hereto.
2 Such items are believed to be in Cross-Defendant's custody,
3 control or possession, not privileged, and relevant to the
4 subject matter of this action or reasonably calculated to
5 lead to the discovery of admissible evidence in this action.

6 PLEASE TAKE FURTHER NOTICE that, pursuant to the
7 express provisions of Code of Civil Procedure, Section 2031,
8 Cross-Defendant shall serve a written response, subscribed
9 under oath by an officer, director or managing agent of
10 Cross-Defendant to this Request within twenty (20) days after
11 service of this Request. Said sworn Response, pursuant to
12 the requirements of Section 2031(b), "shall identify the
13 documents, papers, books, accounts, letters, photographs,
14 objects, and tangible things falling within the categories
15 specified in the request which are in the possession, custody
16 or control of the responding party."


EXHIBIT 18 PAGE 27

17 This Request calls for identification and produc-
18 tion of, and defines "documents" to mean, without limitation,
19 the following items, whether printed or recorded or
20 reproduced by any other mechanical process, including audio
21 and/or visual process, or written or produced by hand:
22 agreements, communications, city, state and/or federal
23 governmental proceedings and hearings, transcripts and
24 reports, correspondence, telegrams, memoranda, summaries of
25 records of telephone conversations or interviews, diaries,
26 graphs, reports, notebooks, note charts, plans, summaries or
27 records of meetings or conferences, summaries or reports of
28 investigations or negotiations, ¹⁵⁴ opinions or reports of

1 counsel, consultants, photographs, tape recordings, cas-
 2 settes, motion picture or television films, brochures,
 3 pamphlets, advertisements, circulars, press releases,
 4 articles, or any publications, drafts, files, letters, any
 5 marginal comments appearing on any document, computer
 6 print-outs and all other writings, or printed materials.

7
 8 DATED: August 4, 1986

9 CONTOS & BUNCH

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 11 By: 
 12 JULIA DRAGOJEVIC
 13 Attorneys for Defendant
 14 and Cross-Complainant
 15 GERALD ARMSTRONG

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SCHEDULE A

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3 1. All documents from which the entries on the
4 14-page "time track" were excerpted or on which the entries
5 were based. Said "time track" was produced as part of the
6 B-1 File during the Christofferson trial.

7 2. All documents contained in Cross-Complainant's
8 "ethics" and "personnel" files.

9 3. All records and documents concerning the
10 incarceration of Cross-Complainant in the US GO Intelligence
11 Bureau in Fifield Manor in June, 1976.

12 4. All documents generated as a result of the
13 interview of Cross-Complainant done by GO Intelligence
14 official, Brian Roubinek, in July/August, 1976 in Clearwater,
15 Florida.

16 5. All Compliance reports, progress reports or
17 any documentation whatsoever regarding each of the "steps" of
18 the "Gerry Armstrong Project" of February 17, 1982, attached
19 hereto as Exhibit A.

20 6. Any and all documentation containing
21 information culled from Cross-Complainant's pc (or preclear,
22 or auditing, or processing) files. EXHIBIT U PAGE 29

23 7. All documentation upon which the report of
24 September 30, 1982 re Dead Agenting Gerry Armstrong is based.

25 8. Any and all documentation, including
26 correspondence and reports to and from the private
27 investigators who surveilled Cross-Complainant and his wife
28 beginning in May, 1982, and who assaulted Cross-Complainant,

1 ran into him, attempted to involve Jocelyn Armstrong and him
2 in freeway accidents, and who followed and harassed them
3 through September, 1982.

4 9. Any and all documentation concerning a visit
5 and subsequent telephone calls to Cross-Complainant by Marty
6 Rathbun from February through April, 1984. Said
7 documentation includes, but is not limited to, an "eval"
8 Mr. Rathbun stated had been done regarding Cross-Complainant,
9 as well as all documents relating to the "eval."

10 10. The mission, project or program orders
11 pursuant to which Terri Gamboa met with Cross-Complainant on
12 March 8, 1984, and subsequently wrote her "debrief" of
13 March 12, 1984 attached hereto as Exhibit B.

14 11. All orders, reports, correspondence and
15 documents concerning surveillance and harassment of Cross-
16 Complainant by agents of Cross-Defendant in London in June,
17 1984.

18 12. All orders, reports, correspondence and
19 documents relating to the operation in June, 1984 to use
20 Cross-Complainant's folders to entrap him. This operation
21 was acknowledged by the two agents of Cross-Defendant, Mike
22 Rinder and "Joey," in the videotapes illegally taken of
23 Cross-Complainant in November, 1984.

24 13. All orders, reports, correspondence, and
25 documents relating to OSA INT Executive Directive 19, of
26 September 20, 1984, a copy of which is attached hereto as
27 Exhibit C.

28 14. All orders, reports and documents concerning

1 the photographing of Cross-Complainant by Cross-Defendant's
2 members on November 8, 1984 in Los Angeles, including the
3 original photographs taken.

4 15. All orders, reports, correspondence, materials
5 and documents concerning the burglarizing of the trunk of
6 Cross-Complainant's car on November 8, 1984, and the theft
7 therefrom of a manuscript and artwork of approximately
8 350 pages, and various documents relating to the within
9 litigation. This request includes the stolen materials
10 themselves.

11 16. All copies made by Cross-Defendant's agents,
12 known to Cross-Complainant as "Joey" and "Rena," of Cross-
13 Complainant's writings and drawings which "Rena" requested as
14 a potential publisher, and which Cross-Complainant loaned to
15 "Rena" on November 9, 1984. These consisted of approximately
16 250 pages of personal creative works.

17 17. All records, reports, orders, correspondence,
18 documents and audio and video recordings of a meeting
19 (arranged by Cross-Defendant's agents posing as "reformers")
20 between an attorney, Thomas Janeway, and Cross-Complainant in
21 November, 1984 in Encino, California.

22 18. All records, reports, correspondence, orders,
23 documents or materials relating to the obtaining of false
24 authorizations directing and/or authorizing the videotaping
25 and wiretapping of attorney Michael Flynn and Cross-
26 Complainant in November and December, 1984. Three of these
27 authorizations are attached hereto as Exhibit D.

28 19. All records, reports, correspondence, orders,

EXHIBIT 4 PAGE 31

1 audio and video recordings, documents or materials relating
2 to an attempt by Cross-Defendant's agents to persuade Cross-
3 Complainant to fly to Las Vegas, Nevada in the fall of 1984
4 to meet with a proposed "backer" of Cross-Defendant's agents
5 posing as "reformers."

6 20. All correspondence, reports, statements,
7 documents or materials supplied to or received from the Los
8 Angeles Police Department, or any officer thereof, from 1982
9 through 1984 regarding various attempts to have criminal
10 charges brought against Cross-Complainant in connection with
11 Cross-Complainant's alleged theft of the Hubbard archives.
12 This includes, but is not limited to, documentation generated
13 through contacts with Officer S.J. Capuano in the
14 N.E. Detective Division of the Los Angeles Police Department.

15 21. All orders, reports, projects, programs,
16 briefings and debriefings, audio and video recordings, and
17 all related documents and materials concerning what the
18 Organization calls the "Armstrong Operation." This operation
19 involved the use of Cross-Complainant's friend, Dan Sherman,
20 to get close to Cross-Complainant, feed him false
21 information, compromise him and frame him, with the goals of
22 destroying his reputation, his ability to testify in
23 Scientology litigation, his emotional and physical well-
24 being, his economic base, his marriage and his life. This
25 operation is referenced at page 2 of the February 17, 1982
26 "Gerry Armstrong Project," Exhibit A, under "Step 15."

27 22. All daily reports, weekly reports, battle
28 plans, battle plan reports, statistic reports, private

1 investigator reports on a daily basis from at least 1982 to
2 the present, CSW's, mission orders, projects, programs,
3 evals, targets, estimates, compliance reports, progress
4 reports, orders, nudges, debugs, requests for funds, budgets
5 (FP's), accounting reports, cross file sheets, excerption
6 sheets, computer data and files, briefings, drillings,
7 debriefings, audio and video recordings, wiretape recordings,
8 photographs and any other documents relating to the forgery
9 and attempted cashing of a \$2,000,000 check on the Bank of
10 New England account of L. Ron Hubbard in 1982, and the
11 operation to frame Michael Flynn and Cross-Complainant with
12 the alleged crime.

13 23. All correspondence, orders, reports,
14 statements, documents, photographs, or materials relating to
15 the "Freedom" tabloid issue 61, published in August, 1984, a
16 reduced copy of which is attached as Exhibit E.

17 24. All correspondence, orders, reports,
18 statements, documents, photographs or materials relating to
19 the article entitled "Ex-U.S. Attorney's Role in Check
20 Forgery Surfaces in Boston Court" in the "Freedom" tabloid
21 issue 62, published in October, 1984, a reduced copy of which
22 is attached hereto as Exhibit F.

23 25. All correspondence, orders, reports,
24 statements, photographs, documents or materials relating to
25 the "Freedom" tabloid published in April/May, 1985, a reduced
26 copy of which is attached hereto as Exhibit G.

27 26. All correspondence, orders, reports,
28 statements, photographs, documents or materials relating to

EXHIBIT U PAGE 33

1 the "Freedom" tabloid published in May, 1985, a reduced copy
2 of which is attached hereto as Exhibit H.

3 27. All correspondence, orders, reports,
4 statements, documents or materials relating to the
5 "advertisement" attached hereto as Exhibit I which appeared
6 in "The Oregonian" newspaper of May 30, 1985, in Portland,
7 Oregon, particularly with regard to the statement:

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9 "Another one of Christofferson's
10 key witnesses, Gerry Armstrong, a
11 government informant, was
12 indisputably shown to have engaged
13 in an operation to infiltrate the
14 Church of Scientology. Armstrong's
15 plot, based on evidence submitted in
16 court, appears to have been
17 conceived with the advice and
18 consent of Flynn and members of the
19 IRS Intelligence Branch. It
20 indicated the planting of forged
21 documents in the church which could
22 then be "discovered" by government
23 agents in planned raids on church
24 premises. The forged documents
25 would incriminate the church in
26 nonexistent illegal activities and
27 would serve as a basis for the
28 indictment of current church

EXHIBIT 6 PAGE 34

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1 management."

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28. All correspondence, orders, reports, statements, documents or materials relating to Cross-Defendant's radio show "Freedom Magazine" on station WTTB in Boston on June 11, 1985, a transcript of which is attached hereto as Exhibit J.

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29. All correspondence, orders, reports, statements, documents, payments, receipts or cancelled checks sent to or received from L. Fletcher Prouty relating to Cross-Complainant.

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30. All edited versions of the videotapes which had originally been made of Cross-Complainant in November, 1984. Attached hereto as Exhibit K is a flyer distributed to Scientologists in April and May, 1985 directing them to a showing of an edited version of the tapes.

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31. All correspondence, orders, reports, statements, documents or materials relating to the editing of the videotapes, including the editing which occurred prior to the Christofferson trial, as well as the audio sections edited out of the videotapes.

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32. All correspondence, orders, reports, statements, documents or materials relating to the delivering/sending of edited versions of the videotapes to any members of the media.

EXHIBIT 6 PAGE 35

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33. All correspondence, orders, reports, statements, documents or materials relating to Cross-Complainant sent to any media including newspapers,

1 television and radio stations.

2 34. All correspondence, orders, reports,
3 statements, documents or materials, relating to the showing
4 of the videotapes or edited versions thereof to staff or
5 public Scientologists, including any briefings given,
6 requests for "donations" or funds, any projects, programs or
7 evals related to this operation and any financial records of
8 said operation.

9 35. All correspondence, orders, reports,
10 statements, documents or materials relating to the
11 photographing of Cross-Complainant's residence in Boston,
12 Massachusetts on October 7, 1985, including all photographs
13 taken.

14 36. All correspondence, orders, reports,
15 statements, documents or materials relating to the mugging
16 and robbery of Cross-Complainant outside his residence in
17 Boston on October 25, 1985.

18 37. All correspondence, reports, statements,
19 documents or materials regarding an incident which occurred
20 on October 13, 1985, when a Scientologist reported to the FBI
21 that Cross-Complainant was posing as an FBI agent near the
22 Massachusetts Bay Transportation Authority Green Line
23 Auditorium Stop in Boston.

24 38. All correspondence, reports, statements,
25 documents or materials concerning the operation to bring
26 false criminal charges against Cross-Complainant via the FBI
27 as described in Request No. 37 above.

28 39. All correspondence, orders, reports,

1 statements, documents or materials relating to the "Freedom"
2 tabloid published in February, 1986, a reduced copy of which
3 is attached hereto as Exhibit L.

4 40. All correspondence, orders, reports,
5 statements, documents or materials relating to the operation
6 to have several hundred copies of the "Freedom" tabloid
7 (Exhibit L) planted in the building where Cross-Complainant
8 works on February 11, 1986, during his deposition in the case
9 of Burden v. Church of Scientology.

10 41. All correspondence, orders, mission orders,
11 reports, telexes, statements, documents or materials relating
12 to an operation or mission in February and March, 1986
13 involving organization agent, Meryl Dubay, the purpose of
14 which was to "Black PR" Cross-Complainant among plaintiffs
15 and witnesses in various cases against the Organization.

16 42. All correspondence, orders, reports,
17 statements, documents or materials relating to the
18 photographing of Cross-Complainant's residence on March 21,
19 1986.

20 43. All correspondence, orders, reports,
21 statements, documents or materials regarding Cross-
22 Complainant delivered to the Internal Revenue Service in 1985
23 and 1986.

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